

EXHIBIT A

(State Court Pleadings)

ELECTRONICALLY FILED - 2021 Mar 18 3:08 PM - ORANGEBURG - COMMON PLEAS - CASE#2021CP3800293

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
) FIRST JUDICIAL CIRCUIT
COUNTY OF ORANGEBURG)

LORETHIA NEWSOME, a/k/a) Case No. 2021-CP-38-_____
Lourita Newson,)
)
Plaintiff,)
)
vs.)
)
)
SUMMONS
(Jury Trial Requested)
LOWE'S HOME CENTERS, LLC,)
formerly known as Lowe's)
Companies, Inc.,)
)
Defendant.)

TO: THE ABOVE – NAMED DEFENDANT:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your answer to the said Complaint on the undersigned Attorney for the Plaintiff, at Post Office Box 1346, Orangeburg, SC 29116, within thirty (30) days after the service hereof, exclusive of the day of such service, and if you fail to answer the Complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for the relief demanded in this Complaint.

At Orangeburg, South Carolina.

Dated: March 18th, 2020

GLENN WALTERS, Esquire
1910 Russell Street (29115)
Post Office Box 1346
Orangeburg, SC 29116
Ph: 803 531-8844
Fax: 803 531-3628
SC Bar No.: 13198

Attorney for Plaintiff

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FIRST JUDICIAL CIRCUIT
COUNTY OF ORANGEBURG)	
 LORETHIA NEWSOME, a/k/a)	Case No. 2021-CP-38-_____
Lourita Newson,)	
)	
Plaintiff,)	
)	
vs.)	COMPLAINT
)	(Jury Trial Requested)
)	
LOWE'S HOME CENTERS, LLC,)	
formerly known as Lowe's)	
Companies, Inc.,)	
)	
Defendant.)	

NOW COMES PLAINTIFF, Lorethia Newsome, also known as Lourita Newsome, by and through the undersigned attorney, complaining of the Defendant as follows:

GENERAL ALLEGATIONS:

1. Plaintiff is a citizen and resident of the County of Orangeburg, State of South Carolina, now and at all times relevant to this lawsuit.
2. Defendant Lowe's Home Centers, LLC ["Lowe's"], formerly known as Lowe's Companies, Inc., is a North Carolina limited liability company specializing in home improvement, with its headquarters in Mooresville, North Carolina. The registered agent for Lowe's is CORPORATION SERVICE COMPANY, 1703 LAUREL STREET COLUMBIA, South Carolina 29201.
3. Lowe's operates a chain of retail stores in the United States and Canada. As of November 2018, Lowe's and its related businesses operate 2,015 home improvement and hardware stores in North America, including LOWE'S OF ORANGEBURG, SC -

Store #0559, 2896 North Rd Hwy 178, County of Orangeburg, State of South Carolina [hereinafter referred to as "Lowe's #0559"].

CLAIM FOR RELIEF
(Gross Negligence)

4. Plaintiff incorporates by reference the allegations contained in paragraphs one through three above within this First Claim for Relief as if fully setout herein.
5. On or about May 22, 2019, Plaintiff was a customer in the Lowe's #0559, shopping for some items that she needed.
6. While Plaintiff was in the store at the alleged date, Defendant's employee by the name of "T.J" pushed some 2 x 4's and cause the said lumber to strike the Plaintiff's foot ["the lumber incident"].
7. As a direct and proximate result of the lumber incident as heretofore described, Plaintiff's right foot was injured.
8. The condition which caused the Plaintiff to be injured was a dangerous condition which was created by the Defendant's inaction, known to the Defendant's employee(s), or should have been known to the Defendant in the exercise of reasonable care, and it should have been corrected or Plaintiff should have been warned of its existence.
9. Defendant owed Plaintiff the non-delegable duty of exercising reasonable or ordinary care for her safety.
10. Defendant breached the duty owed to Plaintiff in one or more of the following ways, to wit:
 - a. By failing to adequately warn the Plaintiff of the dangerous conditions;

- b. By failing to take preventive measures to prevent the foreseeable dangerous condition;
 - c. By failing to adequately correct the dangerous conditions;
 - d. By failing to inspect to the area on a regular basis;
 - f. By failing to warn the Plaintiff of the dangerous condition;
 - g. By failing to remedy the problem of the dangerous condition once it knew or should have known of its existence.
11. The dangerous conditions were the sole cause of Plaintiff's injury.
12. As a direct and proximate result of Defendant's breach of duty as alleged above, Plaintiff was severely injured, suffered great physical pain, incurred substantial medical bills, suffered emotional distress, loss sleep, and was humiliated as a result of a fall, among other tangible and intangible damages, all in an amount to be proved at trial.
13. Defendant's acts were deliberate, reckless, intentional, or done in a manner with a conscious and total disregard for the rights of the Plaintiff. Therefore, Plaintiff is entitled to an award of punitive damages, in an amount to be proved at trial.

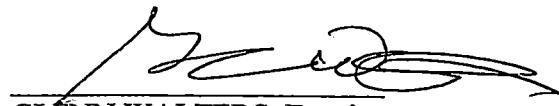
WHEREFORE, having alleged her Claim against the Defendant, Plaintiff demands the following relief:

- a. For a judgment awarding them actual and punitive damage against the Defendant, in an amount to be proved at trial, including an award of trebled damages and attorney's fees;
- b. For such further relief this Court deems just and proper.

JURY TRIAL REQUESTED.

At Orangeburg, SC

Dated: March 18, 2021



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Attorney for Plaintiff

CERTIFIED MAIL

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